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Attorneys for Defendants
Private Healthcare Systems, Inc. s/h/a "PHCS Private
Health Systems," and MultiPlan, Inc.

UNITED STATES DISTRICT COURT
DISTRICT COURT OF NEW JERSEY

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MICHELE SANDER,

Plaintiff, Civil No.: 08-cv-1383
(PGS/ES)

-against-

HR TRUST SERVICES, LLC, HR,
TRUST LLP, HRT SERVICES, II, LLP,
HRT INSURANCE AGENCY, LLP,
OUTSOURCING WORKS, LLP,
1099 GROUP BENEFITS, LLP, IBO
MANAGED SERVICES, INC.,
ACEVEDO SPAIN HOLDING, INC.,
ACEVEDO SPAIN, LP, RONALD
SPAIN a/k/a RON SPAIN, JANICE
ACEVEDO, SUPERIEN HEALTH
NETWORKS, INTERPLAN HEALTH
GROUP, PHCS PRIVATE HEALTH
SYSTEMS, MULTIPLAN, INC.,
LDI PHARMACY SERVICES,
INTERGROUP SERVIES, INC.,
WEB-TPA, INC., SPECTERA, INC.,
AND UNITED HEATHCARE GROUP,

**DECLARATION OF MARCY
FELLER**

Defendants.
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I, Marcy Feller, pursuant to 28 U.S.C. §1746(2), declare under penalty of perjury the
following:

1. I am currently employed as General Counsel to MultiPlan, Inc. ("MultiPlan") which acquired Private Health Care Systems, Inc. ("PHCS") in October of 2006. As General Counsel, I am fully familiar with the facts and circumstances set forth herein. I submit this Declaration in support of PHCS and MultiPlan's motion to dismiss Sander's Second Amended Complaint.

2. MultiPlan and HR Trust entered into a Client Services Agreement on March 1, 2007. A true and correct copy of this agreement is annexed hereto as "Exhibit A."

3. MultiPlan has conducted a diligent search to find any and all documents pertaining to the relationship between PHCS and HR Trust but was unable to locate any such documents.

4. Prior to its purchase by Multiplan in 2006, PHCS, like Multiplan, simply maintained a provider network to which HR Trust and other such entities were permitted access upon payment of a fee.

5. Prior to its purchase by Multiplan in 2006, PHCS, like Multiplan, did not determine eligibility, make benefit determinations, or pay benefit claims.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 28, 2010
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MARCY FELLER